

March 14, 2018

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VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *In the Matter of W. Mansfield Jennings Limited Partnership, and Hargray Communications Group, Inc.*, WC Docket 18-52

Dear Ms. Dortch:

On March 12, 2018, Trey Judy, Director, Hargray Communications Group, Inc. (“Hargray”) and the undersigned met via telephone with Suzanne Yelen and Joseph Sorresso of the Wireline Competition Bureau to discuss Hargray’s pending Application to Transfer ComSouth’s Domestic Section 214 Authority to Hargray.<sup>1</sup>

During the meeting, we reiterated that the transaction will result in tremendous public interest benefits and produce efficiencies.<sup>2</sup> We also explained that although the Federal Communications Commission’s rules provide sufficient protection to guard against any potential concerns regarding allocation of shared costs,<sup>3</sup> Hargray has adopted internal cost allocation procedures that go above and beyond the Commission’s rules and provide additional assurances that our allocation of shared costs will be reasonable.<sup>4</sup>

If the Commission nonetheless continues to have concerns about the potential for unreasonable shifting of shared costs, we expressed our willingness to work with the Commission to address these concerns. For example, we discussed the Commission’s existing

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<sup>1</sup> See *Application to Transfer Control of Domestic 214 Authority*, Application, WC Docket 18-52 (filed Feb. 22, 2018) (“Application”).

<sup>2</sup> See Letter from Rebekah Goodheart, counsel to Hargray, to Marlene H. Dortch, Secretary, FCC, WC Docket 18-52 (filed March 1, 2018) (“March 1 Ex Parte”).

<sup>3</sup> See generally 47 C.F.R. pts. 32, 36, 54, 64, and 69.

<sup>4</sup> See March 1 Ex Parte at 1-2.

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controls regarding operating expenditures and capital investments as well as other potential safeguards. We encouraged the Commission to approve the transaction as soon as possible.

Please contact me if you have any questions regarding these matters.

Sincerely,

*/s/ Rebekah P. Goodheart*

Rebekah P. Goodheart

cc: Suzanne Yelen  
Joseph Sorresso